

# Exhibit A

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
Philadelphia Division

IN RE:	
HELEN K. GAY	Chapter 13
Debtor	Case No. 23-12178-PMM
TEACHERS FEDERAL CREDIT UNION	
Movant	Ref. Dkt. Nos. 44 and 46
v.	
HELEN K. GAY (Debtor)	
KENNETH E. WEST (Trustee)	
Respondents	

**CONSENT ORDER / STIPULATION AGREEMENT SETTLING  
MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, upon the Motion of Teachers Federal Credit Union (“Movant”), through its counsel, Orland PC, for Relief from the Automatic Stay pursuant to Bankruptcy Code § 362 as to certain property, 2022 Kia Telluride (the “Property”), it is hereby agreed as follows:

Helen K. Gay (“Debtor”) acknowledges that the post-petition arrearage is subsequent to 10/2023 as follows:

Payments (03/08/2024 @ \$519.90 each)	\$519.90
Payments (04/08/2024 @ \$694.80 each)	\$694.80
Attorney’s fees/costs	\$1,249.00
Less Suspense	\$0.00
Total Post-Petition Arrears (“Arrears”)	\$2,463.70

1. Debtor shall cure the Arrears as set forth above by paying One-Fifth (1/5) of the Arrears per month (\$410.62/month) for the next five (5) months and the last payment of the Arrears will be \$410.58, with said payments to begin on May 15, 2024, and the regularly monthly payment of \$694.78, to resume on May 8, 2024. In the event the regular monthly payment changes for any reason, then the amount due pursuant to this paragraph shall be adjusted accordingly. Thereafter, Debtor agrees to continue making the regular monthly mortgage payments.

2. Debtor shall send all payments due directly to Creditor at the address below:

**Greenspoon Marder LLP  
100 W. Cypress Creek Rd.  
Suite 700  
Fort Lauderdale, FL 33309**

3. In the event Debtor fails to make any of the payments set forth above on or before their due dates, Movant may give Debtor and Debtor's counsel notice of the default. If Debtor does not cure the default within fifteen (15) days of the notice, upon Certification of Default to the Court, and request for Order, with a copy to Debtor and Debtor's counsel, Movant shall be entitled to the entry of an Order granting it relief from the automatic stay.

4. The failure by the Movant, at any time, to file a Certification of Default upon default by the Debtor, shall not act as a waiver of any of Movant's rights hereunder.

5. Upon issuance of the aforesaid Order, the parties hereto further agree that Movant may proceed in state court to exercise all rights and remedies available to it as a mortgagee and creditor under state and federal law including, but not limited to, the initiation of and continuation of repossession/replevin and/or collections.

6. In the event Debtor converts this case to any other chapter of Title 11 of the U.S. Bankruptcy Code then Debtor shall pay all pre-petition arrears and post-petition arrears within 10 days from the date of conversion. If Debtor fails to make payments in accordance with this paragraph then the Movant, through Counsel, may file a Certification of Default to the Court, setting forth said failure and Movant shall be granted relief from the automatic stay.

7. It is further agreed that, in the event the stay is lifted, the 14-day stay provided by Rule 4001(a)(3) is hereby waived.

8. The undersigned parties request that the Court enter an Order approving this Consent Order/Stipulation and the terms therein.

Seen and agreed by the parties on the date set forth below:

Date: May 21, 2024

Approved as to form and content:

/s/ LeeAne O. Huggins  
Kenneth E. West  
Chapter 13 Trustee  
P.O. Box 40837  
Philadelphia, PA 19107

/s/ Brad J. Sadek  
Brad J. Sadek  
Attorneys for Debtor  
1500 JFK Boulevard, Ste 220  
Philadelphia, PA 19102  
Email: brad@sadeklaw.com

Date: May 21, 2024

Respectfully Submitted,

/s/ Michael H. Kaliner  
Michael H. Kaliner, Esq. PA 28747  
Orlans PC  
Attorney for Teachers Federal Credit Union  
200 Eagle Road, Bldg 2, Suite 120  
Wayne, PA 19087  
(484) 367-4191  
Email: mkaliner@orlans.com  
File Number: 24-002955

AND NOW, this 22nd day of May, 2024, it is hereby ORDERED that this Stipulation Agreement between the parties is hereby approved.



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Honorable Patricia M. Mayer  
U.S. Bankruptcy Judge

## Exhibit B

## ORLANS PC

A law firm licensed in  
DC, DE, FL, MA, MD, MI, NH, PA, RI, VA

200 Eagle Road, Suite 120  
Wayne, PA 19087  
P (484) 367-4191 F (484) 367-4192  
www.Orlans.com  
Business Hours: 8:30 AM – 5:00 PM ET

June 20, 2024

Helen K. Gay  
1646 Ward Street  
Marcus Hook, PA 19061

Re: Helen K. Gay  
Bankruptcy No. 23-12178

Ms. Gay,

Please be advised that you are in default of the terms of the Stipulation with Teachers Federal Credit Union approved on May 22, 2024. As of June 19, 2024, the following payments are due and owing:

Regular mortgage payments for May and June, 2024 @ \$694.78 each	\$1,389.56
Less credit for partial May mortgage payment	(460.00)
Arrears for May and June, 2024 @ \$410.62 each	<u>\$ 821.24</u>
TOTAL DUE:	\$1,750.80

If the payments are not cured within fifteen (15) days of this notice, a Certificate of Default requesting the entry of an order granting relief from the automatic stay will be filed.

Sincerely,



Michael H. Kaliner

MHK/pam  
Cc: Brad J. Sadek, Esquire

THIS FIRM IS A DEBT COLLECTOR AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.  
IF YOUR PERSONAL LIABILITY FOR THE DEBT HAS BEEN DISCHARGED IN BANKRUPTCY WE ARE ONLY  
PROCEEDING AGAINST THE COLLATERAL SECURING THE LOAN.